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Before the  
FEDERAL COMMUNICATIONS COMMISSION

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is the optimal solution to the imbalances that exist in these market segments.

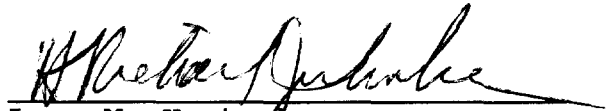
Moreover, Sprint is concerned that at least two petitioners define the "0+ public domain" solution so broadly as to affect practices of other carriers, including Sprint, that are not part of the problem. Specifically, LDDS (at 1) and PhoneTel (at 1) both define "0+ public domain" as requiring all issuers of proprietary calling cards either to limit the use of those cards to a proprietary access code, or to allow all other carriers to validate the calling cards. The difficulty that this broad formulation poses for Sprint and other IXC's that have always instructed their customers to use an access code, is that they have no way at present to block calls dialed "0+" -- contrary to their instructions -- from phones that are presubscribed to them, without also blocking the 10XXX code. The Report and Order (paras. 28-29, 31) noted that there is no way at present for an IXC to determine whether a call it receives was dialed on a 0+ basis or a 10XXX basis, and that the attainment of this capability would either take several years, or would impose significantly higher costs on IXC's, or both.

Thus, the practical effect of a broadly formulated definition of "0+ public domain" would be to require Sprint and other IXC's to abandon 10XXX as an access method for calling card calls, in order to eliminate the possibility of accepting 0+ calls. The Commission, in para. 32, found that such an abandonment "is clearly not in the public interest", and none of the petitioners contend otherwise. Such a result would be particularly punitive to an IXC, such as Sprint, that has recently begun utilizing

10XXX access for calling card calls, in addition to the 800 number it has relied on in the past, in an effort to mitigate the dialing disadvantages that it faces vis-a-vis AT&T for its calling cards. Sprint, and other similarly-situated IXC's, should not be forced to bear the brunt of solving a problem that is of AT&T's making.

Respectfully submitted,

SPRINT COMMUNICATIONS CO.

A handwritten signature in dark ink, appearing to read "Leon M. Kestenbaum", is written over a horizontal line.

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March 19, 1993

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing "Opposition of Sprint to Petitions for Reconsideration" of Sprint Communications Co. were sent via first class mail, postage prepaid, on this the 19th day of March, 1993, to the below-listed parties:

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